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Attorneys for Mowbray Waterman Property,  
LLC, Debtor and Debtor-in-Possession

**UNITED STATES BANKRUPTCY COURT**

**CENTRAL DISTRICT OF CALIFORNIA – SANTA ANA DIVISION**

In re:  
THE ORIGINAL MOWBRAY’S TREE  
SERVICE, INC., a Delaware corporation,  
Debtor and Debtor-in-Possession.

Lead Case No. 8:24-bk-12674-SC

Chapter 11

(Jointly Administered with Case Nos.  
8:25-bk-10542-SC and 8:25-bk-10543-SC)

In re:  
MOWBRAY WATERMAN PROPERTY,  
LLC,  
Debtor and Debtor-in-Possession.

**MOTION FOR ORDER CONTINUING  
HEARING ON DEBTOR’S MOTION FOR  
ORDER APPROVING SALE OF THE REAL  
PROPERTY LOCATED AT 17332  
MILLWOOD DR., VISALIA, CA;  
DECLARATION OF ROYE ZUR**

[Relates to Docket No. 111 in Case No.  
8:25-bk-10542]

In re:  
ROBIN ELAINE MOWBRAY,  
Debtor and Debtor-in-Possession.

**Current Hearing (via ZoomGov):**

Date: September 17, 2025  
Time: 1:30 p.m.  
Place: Courtroom 5C  
411 West Fourth Street  
Santa Ana, CA 92701

- ☐ Affects THE ORIGINAL MOWBRAY  
TREE SERVICE, INC.
- ☒ Affects MOWBRAY WATERMAN  
PROPERTY, LLC
- ☐ Affects ROBIN ELAINE MOWBRAY
- ☐ Affects All Debtors

**Proposed Continued Hearing (via ZoomGov):**

Date: October 2, 2025  
Time: 11:00 a.m.  
Place: Courtroom 5C  
411 West Fourth Street  
Santa Ana, CA 92701

1 **TO THE HONORABLE SCOTT C. CLARKSON, UNITED STATES BANKRUPTCY**  
2 **JUDGE:**

3 Mowbray Waterman Property, LLC (the “Debtor”), the affected debtor and debtor-in-  
4 possession in the above-jointly administered case, hereby submits this motion continue the hearing  
5 (the “Motion”) on the Debtor’s *Motion for Order: (1) Authorizing Sale of Real Property Located at*  
6 *17332 Millwood Drive, Visalia, CA Pursuant to 11 U.S.C. § 363(b) and (f); (2) Approving Overbid*  
7 *Procedures; (3) Approving Buyer, Successful Bidder, and Back-Up Bidder as Good-Faith*  
8 *Purchasers Pursuant To 11 U.S.C. § 363(m); and (4) Authorizing Payment of Real Estate Broker’s*  
9 *Commission and Ordinary Costs of Sale* [Docket No. 111 in Case No. 8:25-bk-10542-SC] (the  
10 “Millwood Sale Motion”).

11 Pursuant to Local Bankruptcy Rule 9013-1(m), a party may file a motion to continue a  
12 hearing within three days of the hearing. The Debtor was unable to file the Motion earlier because  
13 it did not become aware of the need for the continuance (discussed below) until the afternoon of  
14 September 15, 2025.

15 The Debtor filed the Millwood Sale Motion on August 13, 2025, and noticed it for a hearing  
16 to be held on September 10, 2025, with other matters in the case. The Clerk’s Office subsequently  
17 set the Millwood Sale Motion for hearing on September 17, 2025. On September 15, 2025, the  
18 Debtor’s real estate broker in connection with the sale transaction informed the Debtor and its  
19 counsel that the proposed buyer for the Debtor’s real property has performed a second inspection  
20 on a well at the property, that a report is due to be provided in the coming days, and that the buyer  
21 has requested that the hearing on Motion be continued for approximately two weeks (to provide the  
22 buyer with an opportunity to review that report). As of the date of this Motion, no opposition to the  
23 Millwood Sale Motion has been filed, and no overbids have been submitted to the Debtor’s broker  
24 or counsel. No prior continuance of the Millwood Sale Motion has been requested or granted.

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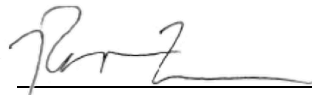
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1 Given that no other offers for the property have been submitted, it is in the best interests of  
2 the Debtor and its estate to accommodate the buyer's request and seek a short continuance.  
3 Accordingly, the Debtor respectfully requests that the Court continue the hearing on the Millwood  
4 Sale Motion to October 2, 2025, at 11:00 a.m., which is a date on which other matters in these  
5 jointly-administered cases will be heard. To the extent that the hearing on the Millwood Sale Motion  
6 is continued, the Debtor will agree to extend the deadline to submit qualified bids from September  
7 15, 2025, at 5:00 p.m., to September 30, 2025, at 5:00 p.m.

8  
9 DATED: September 15, 2025

ELKINS KALT WEINTRAUB REUBEN  
GARTSIDE LLP

10  
11 By:   
12 ROYE ZUR  
13 Attorneys for Mowbray Waterman Property, LLC,  
14 Debtor and Debtor-in-Possession  
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**DECLARATION OF ROYE ZUR**

I, Roye Zur, declare as follows:

1. I am an attorney duly admitted to practice before this Court. I am a partner with Elkins Kalt Weintraub Reuben Gartside LLP, attorneys of record for Mowbray Waterman Property, LLC (the “Debtor”), debtor and debtor-in-possession. I have personal knowledge of the facts set forth herein, and if called as a witness, I could and would competently testify thereto. I make this declaration in support of the Debtor’s Motion for Order Continuing Hearing on Debtor’s Motion for Order Approving Sale of the Real Property Located at 17332 Millwood Dr., Visalia, CA (the “Motion”). All capitalized terms not defined herein shall have the meanings ascribed to them in the Motion.

2. The Debtor filed the Millwood Sale Motion on August 13, 2025, and noticed it for a hearing to be held on September 10, 2025, with other matters in the case. The Clerk’s Office subsequently set the Millwood Sale Motion for hearing on September 17, 2025.

3. On September 15, 2025, the Debtor’s real estate broker in connection with the sale transaction reflected in the Millwood Sale Motion contacted me and informed me that the proposed buyer for the Debtor’s real property has performed a second inspection on a well at the property, that a report is due to be provided in the coming days, and that the buyer has requested that the hearing on Motion be continued for approximately two weeks (*i.e.*, to a date following the expected production of the report).

4. As of the date of the Motion, no opposition to the Millwood Sale Motion has been filed, and no overbids have been submitted to the Debtor’s broker or counsel. Given that no other offers for the property have been submitted, I believe that it is in the best interests of the Debtor and its estate to accommodate the buyer’s request and seek a short continuance. No prior continuance of the Millwood Sale Motion has been requested or granted.

I declare under penalty of perjury that the foregoing is true and correct.

Executed September 15, 2025, at Los Angeles, California.

  
\_\_\_\_\_  
Roye Zur

## PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:  
10345 Olympic Boulevard, Los Angeles, California 90064.

A true and correct copy of the foregoing documents entitled (*specify*): **MOTION FOR ORDER CONTINUING HEARING ON DEBTOR'S MOTION FOR ORDER APPROVING SALE OF THE REAL PROPERTY LOCATED AT 17332 MILLWOOD DR., VISALIA, CA; DECLARATION OF ROYE ZUR** will be served or were served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

**1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):** Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (*date*) **September 15, 2025**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

- Shraddha Bharatia notices@becket-lee.com
- Jeffrey W Broker jbroker@brokerlaw.biz
- Kenneth J Catanzarite kcatanzarite@catanzarite.com
- Lauren N Gans lgans@elkinskalt.com, lmasse@elkinskalt.com
- Jessica L Giannetta jessica@giannettalawcorp.com, melanie@giannettaenrico.com
- Robert P Goe rgoe@goeforlaw.com, kmurphy@goeforlaw.com; goeforecf@gmail.com; Goe.RobertP.R@notify.bestcase.com; ajohnston@goeforlaw.com
- Marshall F Goldberg mgoldberg@glassgoldberg.com, jbailey@glassgoldberg.com
- Alan Craig Hochheiser ahochheiser@mauricewutscher.com, arodriguez@mauricewutscher.com
- Merdaud Jafarnia bkca@alaw.net, mjafarnia@ecf.inforuptcy.com
- Raffi Khatchadourian raffi@hemar-rousso.com
- Valery Loumber valloumlegal@gmail.com
- Michael B Lubic michael.lubic@klgates.com, jonathan.randolph@klgates.com, klgatesbankruptcy@klgates.com
- James MacLeod jmacleod@dunninglaw.com, nancy@dunninglaw.com
- Kathleen P March kmarch@bkylawfirm.com, kmarch3@sbcglobal.net, kmarch@sbcglobal.net
- Robert S Marticello rmarticello@raineslaw.com, bclark@raineslaw.com; csantiago@raineslaw.com
- David W. Meadows david@davidwmeadowslaw.com
- Karen S. Naylor Becky@ringstadlaw.com, Karen@ringstadlaw.com; Arlene@ringstadlaw.com
- Estela O Pino epino@epinolaw.com, staff@epinolaw.com; clerk@epinolaw.com
- Donald W Reid don@donreidlaw.com, 5969661420@filings.docketbird.com
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- Amitkumar Sharma amit.sharma@aisinfo.com
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- Michael Simon msimon@raineslaw.com, bclark@raineslaw.com; csantiago@raineslaw.com
- Ahren A Tiller ahren.tiller@blc-sd.com, 4436097420@filings.docketbird.com; brett.bodie@blc-sd.com; anika@blc-sd.com; derek@blc-sd.com; kreyes@blc-sd.com; megan@blc-sd.com; nicole@blc-sd.com; danny@blc-sd.com; angie@blc-sd.com; kreyes@blc-sd.com
- United States Trustee (SA) ustpregion16.sa.ecf@usdoj.gov
- Sharon Z. Weiss sharon.weiss@bclplaw.com, raul.morales@bclplaw.com, REC\_KM\_ECF\_SMO@bclplaw.com, sharon-weiss-7104@ecf.pacerpro.com
- Jennifer C Wong bknotice@mccarthyholthus.com, jwong@ecf.courtdrive.com
- Mandy Youngblood csbk@gmfinancial.com
- Roye Zur rzur@elkinskalt.com, lwageman@elkinskalt.com; 1648609420@filings.docketbird.com; rzur@ecf.courtdrive.com; lmasse@elkinskalt.com

**2. SERVED BY UNITED STATES MAIL:**

On (date) **September 15, 2025**, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

Queenie K Ng  
Office of the United States Trustee  
411 West Fourth St., Suite 7160  
Santa Ana, CA 9270

Hon. Scott C. Clarkson  
United States Bankruptcy Court  
411 West Fourth Street, Suite 5130  
Santa Ana, CA 92701-4593

☐ Service information continued on attached page

**3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL** (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (date) **September 15, 2025**, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

September 15, 2025 Lisa Masse  
Date Printed Name

/s/ Lisa Masse  
Signature